

MELIDA HAAG (CABN 132612)  
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)  
Chief, Criminal Division

MARC PRICE WOLF (CABN 254495)  
Special Assistant United States Attorney  
450 Golden Gate Ave., Box 36055  
San Francisco, California 94102  
Telephone: (415) 436-6488  
Fax: (415) 436-7234  
E-Mail: marc.wolf@usdoj.gov

Attorneys for the United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR 13-00120 EMC
	)	
	)	
v.	)	STIPULATION AND [PROPOSED]
	)	ORDER CONTINUING COURT DATE
JASON BAUM,	)	
	)	
Defendant.	)	
_____	)	

The parties – the United States of America and Defendant Jason Baum – jointly request that the Court continue the change of plea currently set on June 19, 2013, at 2:30 p.m. to the new date of June 26, 2013, at 2:30 p.m., before this Court.

This joint request is made because the parties are very close to negotiating a resolution in the matter and defense counsel is still reviewing discovery and investigating the case. Therefore, the parties jointly request that the Court continue the matter to Wednesday, June 26, 2013, at 2:30 p.m.

Failing to exclude the time between June 19, 2013 and June 26, 2013 would unreasonably deny the defendant continuity of counsel and would deny counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

1 18 U.S.C. § 3161(h)(7)(B)(iv). Further, the ends of justice served by excluding the time between  
2 June 19, 2013 and June 26, 2013 from computation under the Speedy Trial Act outweigh the best  
3 interests of the public and the defendant in a speedy trial.

4  
5 SO STIPULATED.

6  
7 Dated: June 18, 2013

\_\_\_\_\_/s/  
MARC PRICE WOLF  
Special Assistant United States Attorney

8  
9  
10 Dated: June 18, 2013

\_\_\_\_\_/s/  
ELIZABETH FALK  
Attorney for Defendant

11  
12 **[PROPOSED] ORDER**

13  
14 For the aforementioned reasons, the hearing in the above-captioned case is continued to  
15 June 26, 2013, at 2:30 p.m. Further, the time between June 19, 2013 and June 26, 2013 shall be  
16 excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

17  
18 IT IS SO ORDERED.

19  
20 DATED: 6/18/13

